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Attorneys for Plaintiff
CYNTHIA RICKS

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CYNTHIA RICKS, an individual,

Case No. 2:20-cv-01359-KJD-(VCF)

Plaintiff,

**THE PARTIES STIPULATION and
(PROPOSED) ORDER
TO EXTEND THE DEADLINE FOR THE
PROPOSED STIPULATED DISCOVERY
PLAN and SCHEDULING ORDER**
(Fed. R. Civ. P. 26(f) and LR 26-1(e))

vs.

**SUN LIFE ASSURANCE COMPANY OF
CANADA**, a foreign corporation, doing
business as SUN LIFE FINANCIAL,

Defendant.

Plaintiff, **CYNTHIA RICKS**, by her counsel, Steven J. Parsons of LAW OFFICES OF STEVEN J. PARSONS and Defendant, **SUN LIFE ASSURANCE COMPANY OF CANADA**, by its counsel, Kristina N. Holmstrom of OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C. hereby stipulate to jointly request that the parties be given additional time within which to propose a Discovery Plan and Scheduling Order (“DPSO”).

The parties have met and conferred and respectfully represent that:

1. Defendant has agreed to produce to Plaintiff the “claim file” Defendant created in administering Plaintiff’s claim. Defendant represents that it will have the claim file to

Plaintiff not later than Thursday, October 22, 2020;

2. Plaintiff will forthwith review and assess the claims file. Plaintiff has alleged a claim for disability benefits within a non-ERISA preempted plan, and claims handling torts have also been alleged. Plaintiff seeks to understand the conduct of Defendant before committing to a DPSO.

3. A proposed DPSO will then be lodged with the Court not later than Thursday, November 5, 2020. In the event the parties are not able to agree on a proposed DPSO, the parties will each file her and its proposed DPSO.

Dated: October 8, 2020.

LAW OFFICES OF STEVEN J. PARSONS

OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.

/s/ Steven J. Parsons
STEVEN J. PARSONS
Nevada Bar No. 363

/s/ Kristina Holmstrom
KRISTINA HOLMSTROM
Nevada Bar No. 10086

Attorney for Plaintiff
CYNTHIA RICKS

Attorneys for Defendant
SUN LIFE ASSURANCE COMPANY OF CANADA

ORDER

IT IS SO ORDERED.

Dated: 10-9-2020 _____.



U.S. MAGISTRATE JUDGE